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Deutsche Bank Aktiengesellschaft,
John Cryan, Christian Sewing,
Marcus Schenck, and James Von Moltke

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ALI KARIMI, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

v.

DEUTSCHE BANK
AKTIENGESELLSCHAFT, JOHN CRYAN,
CHRISTIAN SEWING, MARCUS
SCHENCK, and JAMES VON MOLTKE,

Defendants.

Case No. 2:20-cv-08978

Hon. Esther Salas, U.S.D.J.

Hon. Michael A. Hammer, U.S.M.J.

**DEFENDANTS' NOTICE OF
MOTION TO TRANSFER
PURSUANT TO 28 U.S.C. § 1404(a),
OR, IN THE ALTERNATIVE,
DISMISS PLAINTIFFS' SECOND
AMENDED CLASS ACTION
COMPLAINT**

Oral Argument Requested [L.R. 78.1]

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*Additional Counsel for Plaintiffs and for the
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COUNSEL:

PLEASE TAKE NOTICE that the undersigned attorneys for Defendants Deutsche Bank Aktiengesellschaft, John Cryan, Christian Sewing, Marcus Schenck, and James Von Moltke, upon the accompanying Memorandum of Law, Declaration of Sheila C. Ramesh and the exhibits attached thereto, and proposed form of Order, will move this Court before the Honorable Esther Salas, United States District Judge for the District of New Jersey, 50 Walnut Street, Courtroom 5A, Newark, New Jersey, at a date and time to be determined by this Court, for an Order transferring this action in its entirety to the United States District Court for the Southern District of New York pursuant to 28 U.S.C. § 1404(a), or in the alternative, for an Order dismissing the Second Amended Complaint in its entirety pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6).

PLEASE TAKE FURTHER NOTICE that in accordance with the schedule set by the Court by Stipulation and Order dated January 4, 2021 (ECF 32), Lead Plaintiff shall file any opposition to the Motion by June 1, 2021; and Defendants shall file any reply by July 1, 2021.

PLEASE TAKE FURTHER NOTICE that Defendants respectfully request oral argument at a date and time to be designated by the Court.

Dated: April 23, 2021

Respectfully submitted,

s/Mark C. Errico
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Aktiengesellschaft, John Cryan, Christian Sewing,
Marcus Schenck, and James Von Moltke*

LOCAL CIVIL RULE 11.2 CERTIFICATION

Pursuant to Local Civil Rule 11.2, I certify that, to the best of my knowledge, the matter in controversy is not the subject of another action pending in any court or of any pending arbitration or administrative proceeding.

Dated: April 23, 2021

s/ Mark C. Errico
MARK C. ERRICO

CERTIFICATE OF FILING AND SERVICE

I certify that true copies of the foregoing Defendants' Notice of Motion to Dismiss Plaintiffs' Second Amended Class Action Complaint, or, in the alternative, Transfer Pursuant to 28 U.S.C. § 1404(a), Memorandum of Law in support thereof, Declaration of Sheila C. Ramesh and the exhibits attached thereto, proposed forms of Order, and Local Civil Rule 11.2 Certification were electronically filed with the Court and simultaneously served upon all counsel of record by operation of the Court's CM/ECF system on this 23rd day of April 2021.

s/ Mark C. Errico

MARK C. ERRICO